

SHER TREMONTE LLP

December 3, 2024

**BY ECF**

Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *Bennett v. Cuomo, et al.*, No. 22 Civ. 7846 (VSB) (SLC)**

Dear Judge Cave:

On behalf of our client former Governor Andrew M. Cuomo, today we are filing a letter motion for a protective order prohibiting Plaintiff's counsel from making any further extrajudicial statements concerning defense costs in this matter and a conference regarding the same.

Many of the materials cited and discussed in the motion were produced by Plaintiff and designated by her as Confidential under the operative Protective Order (ECF No. 120).<sup>1</sup> We have also cited the unredacted version of Governor Cuomo's OAG testimony, some of which concerns similar matters. Consequently, certain portions of the motion warrant sealing as they are designated Confidential under the Protective Order.

Therefore, we filed a redacted version of the motion on the public docket and respectfully request that the Court grant Governor Cuomo leave to file under seal an unredacted version of the motion (with redacted portions highlighted). We also respectfully request that the Court grant Governor Cuomo leave to file under seal Exhibits B through M to the letter motion, which comprise the materials described above.

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma

---

<sup>1</sup> While we are submitting this sealing application pursuant to the Protective Order, we do not agree that all of the materials Ms. Bennett has designated Confidential are, in fact, "Confidential" as defined by the Protective Order.